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JOHN ASHCROFT  
Governor

FREDERICK A. BRUNNER  
Director



STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

Macon Regional Office  
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Macon, MO 63552  
816-385-2129

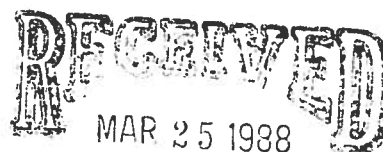
GEN FILE  
Division of Energy  
Division of Environmental Quality  
Division of Geology and Land Survey  
Division of Management Services  
Division of Parks, Recreation,  
and Historic Preservation

3.800 Ralls  
Traffic Paint Mfg.

LOW 88-MC001

March 23, 1988

Ms. Joyce Cook, President  
Traffic Paint Manufacturing Co.  
P.O. Box 211  
Saverton, MO 63467



WASTE MANAGEMENT  
PROGRAM

Dear Ms. Cook:

Please find enclosed a copy of a Report on Hazardous Waste Generator Inspection which has been prepared following an inspection of the Traffic Paint Manufacturing Company facility at Saverton, Missouri. I believe the report is self-explanatory and trust you will direct your attention to the recommendations contained therein.

To determine what steps have been taken to correct deficiencies and comply with the recommendations, a reinspection will be conducted during the week of April 24, 1988.

If you have any questions regarding the enclosed report, please feel free to contact Robert Eck in our Macon office.

Sincerely,

MACON REGIONAL OFFICE

Charles S. Decker, P.E.  
Regional Administrator

CSD/lis

cc: Waste Management Program ✓  
Mark Twain Regional Council of Governments

Enc.



R00129248  
RCRA RECORDS CENTER

REPORT ON HAZARDOUS WASTE GENERATOR INSPECTION  
TRAFFIC PAINT MANUFACTURING, INC.

P.O. BOX 211  
SAVERTON, MO 63467  
EPA ID #MOD054078324  
MO ID #04692  
PH 314-248-0721  
March 23, 1988

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INTRODUCTION

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On January 26, 1988, staff members of the Department of Natural Resources - Macon Regional Office and Waste Management Program conducted an inspection of the hazardous waste management activities at Traffic Paint Manufacturing, Inc., located near Saverton, Missouri. The inspection was conducted to determine compliance with the Missouri Hazardous Waste Management Law (MHWML) and Regulations and the Federal Resource Conservation and Recovery Act (RCRA) and Regulations.

The plant produces and containerizes white and yellow highway striping paint. Pigments, solvents, carriers and driers are formulated in large mixing tanks and then placed in one (1), five (5), 30, or 50 gallon containers. Waste paint, in the past, has been generated at an average rate of one (1) ton/month. One (1) drum of waste oil has accumulated over the last six (6) years. The waste paint is presently managed by American Resource Recovery, Memphis, Tennessee. (TND991279480).

Mr. Dave Epema, with the Waste Management Program's Hazardous Waste Management Unit, accompanied the inspector on the inspection. Mr. Oron Cook, Production Manager, was the company's representative for the inspection and provided available information.

UNSATISFACTORY FEATURES

1. A consecutive shipment number (serially increasing) is not being used on the manifests as required by MHWML Regulation 10 CSR 25-5.262(2)(B)2A.
2. The proper DOT shipping name of the waste is not being used on the manifest as required by MHWML Regulation 10 CSR 25-5.262(2)(B)2 referenced to 40 CFR 262.20 which refers to the Appendix in Section 262.
3. Quarterly manifest reports are not being submitted to the Department of Natural Resources-Waste Management Program as required by MHWML Regulation 10 CSR 25-5.262(2)(B)6A.
4. The proper DOT label is not being affixed to containers in storage as required by MHWML Regulation 10 CSR 25-5.262(2)(C)1 referenced to 40 CFR 262.31.
5. The containers in satellite accumulation were not properly marked as required by MHWML Regulation 10 CSR 25-5.262(2)(C)3 referenced to 40 CFR 262.34(C)(1)ii.

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6. The containers in satellite accumulation were not kept closed as required by MHWML Regulation 10 CSR 25-5.262(2)(C)3 referenced to 40 CFR 262.34(C)(1) which references 265.173(a).
7. There were no personnel training documents to examine as required in MHWML Regulation 10 CSR 25-5.262(2)(C)2 referenced to 40 CFR 262.34(a)(4) which references 255.16.
8. There was no internal <sup>265.16</sup> system immediately available at the hazardous waste ed by MHWML Regulation 10 CSR 25-5.262(2)(C)1 refer ) (4) which references 265.34(a).
9. The addresses of the are not provided in the contingency plan as r ion 10 CSR 25-5.262(2)(C)1 referenced to 40 CFR 262.34(a)(4) which references 265.52(d).
10. A waste oil registration has not been properly completed and submitted as required by MHWML Regulation 10 CSR 25-11.010(2)(A).

#### DISCUSSION

Attention needs to be paid to the proper completion of manifests. Regulations require that Missouri generators use a serially increasing Manifest Document Number. This number is comprised of nine (9) digits; the first five (5) are the facility's assigned Missouri generator ID number. The second four (4) digits are serially increasing starting with 0001 on the first shipment a generator initiates and increasing by one unit on each subsequent shipment. On the Missouri manifest this number is located in grey shaded area line "A." On other state's manifests, the number is placed on line "F" of the grey shaded area. In completing the manifest it is also important to use the proper DOT shipping name (line 11 on manifest). A DOT description that may be used would be "Waste Paint Related Materials, Flammable Liquid, NA1263." If this description does not best describe the waste stream, please refer to 49 CFR 172.101 for additional descriptions.

It is necessary that quarterly reports be submitted to the Department of Natural Resources-Waste Management Program along with a copy of each completed manifest initiated by the generator during the preceding calendar quarter. A copy of the report form will be sent to the generator with this inspection report. The first quarterly report completed by Traffic Paint Manufacturing, Inc. should include all manifests initiated since July 1, 1987.

The proper DOT shipping label must be affixed to each container placed in the storage facility. The red "Flammable Liquid" label is appropriate in this case. The drums in the satellite accumulation area (two (2) drums at the north end of the fill line, must also be marked "Hazardous Waste" or other descriptive

Typo? - 1986

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the date accumulation began in each container. The drums in the satellite accumulation area must be kept closed except when materials are being added or removed.

The Production Manager was unable to avail to the inspector the personnel training documents. He indicated the information had been developed but was unable to find it at the time of the inspection.

An internal communications or alarm system must be provided at the hazardous waste storage area. An individual must be able to summon help if an emergency situation arises at the storage facility.

The Contingency Plan which was developed to deal with hazardous waste emergencies at the facility must also contain the address of the listed emergency coordinators. If phone communications are down, an emergency coordinator will have to be contacted in person and therefore the address is needed.

During the past six (6) years, the facility has accumulated a 55 gallon drum of waste oil. Since the accumulation was greater than 100 Kg (27 gallons) the plant must register with the Department as a waste oil generator. A copy of the registration form will be provided with this report.

#### RECOMMENDATIONS

1. That a serially increasing shipment number be provided on all manifests as required by MHWML Regulation 10 CSR 25-5.262(2)(B)2A.
2. That the proper DOT shipping name be used on each manifest as required by MHWML Regulation 10 CSR 25-5.262(2)(B)2 referenced to 40 CFR 262.20 which refers to the Appendix in Section 262.
3. That quarterly manifest reports be submitted to the Department of Natural Resources-Waste Management Program as required by MHWML Regulation 10 CSR 25-5.262(2)(B)6A.
4. That proper DOT labels be placed on containers in storage as required by MHWML Regulation 10 CSR 25-5.262(2)(C) referenced to 40 CFR 262.31.
5. That containers in satellite accumulation be properly marked as required by MHWML Regulation 10 CSR 25-5.262(2)(C)3 referenced to 40 CFR 262.34(C)(1)ii.
6. That containers in satellite accumulation be kept closed as required by MHWML Regulation 10 CSR 25-5.262(2)(C)3 referenced to 40 CFR 262.34(C)(1)i which references 265.173(a).
7. That appropriate personnel training documents be upgraded and provided ~~for~~ inspection as required by MHWML Regulation 10 CSR 25-5.262(2)(C)1 referenced to 40 CFR 262.34(a)(4) which references 265.16.

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8. That an internal communications or alarm system be provided at the hazardous waste storage facility as required by MHWML Regulation 10 CSR 25-5.262(2)(C)1 referenced to 40 CFR 262.34(a)(4) which references 265.34(a).
9. That the addresses of the emergency coordinators be provided in the contingency plan as required by MHWML Regulation 10 CSR 25-5.262(2)(C)1 referenced to 40 CFR 262.34(a)(4) which references 265.52(d).
10. That a waste oil registration form be completed and submitted as required by MHWML Regulation 10 CSR 25-11.010(2)(A).

INSPECTED BY:



Robert S. P. Eck  
Environmental Specialist IV  
Macon Regional Office

RSPE/ljs

## LARGE QUANTITY GENERATOR CHECKLIST

Name of Facility: Traffic Paint Mfg. Inc. Date: 1/26/88  
 Address: P.O. Box 211  
Squerton, Mo 63467 314-248-0721  
 Facility Requirements: Oron Cook Missouri I.D. # 4692  
 Title: Production Mgr. EPA I.D. # MOD 05407P324  
 Transporter? No # \_\_\_\_\_

Provide a brief description of the manufacturing process.

Mfg of traffic striping paint  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

List the hazardous wastes generated:

	Waste	Amount/month	Kilogram/month	I.D.#	Disposition
1.	<u>Waste Paint</u>	<u>2,190#/mo average</u>			
2.	<u>Waste Oil</u>	<u>1 drum in 6 mos</u>			
3.					
4.					
5.					
6.					

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Manifests and Recordkeeping 10 CSR 25-5.262(1) and 5.262(2)(B) and (D)

- Generator's MO and EPA I.D. Numbers.....
- Manifest document number (MO I.D. & Shipment #) Seq. Invs. needed
- EPA Waste I.D. codes.....
- Generator's name, address, phone #.....
- All Transporters' names, phone #'s, MO and EPA I.D. #'s.....
- Designated facility name, address, phone # and MO and EPA I.D. #.....
- Proper DOT Shipping Name, Hazard Class and I.D. #.....
- Containers, Quantity and Unit Wt/Vol being shipped properly designated.....
- Proper certification including waste minimization.....
- Manifest properly signed and dated.....
- No more than 10 days time between generator and in-state facility signatures.....
- Manifests returned within 35 days.....
- If not, exception generator report submitted within 45 days..... N/A
- Completed manifests and Summary Manifest Report and Certification.....
- Spills of reportable quantities reported to DNR.....
- PRETRANSPORT, CONTAINERIZATION AND LABELING 10 CSR 25-5.262(1) and 5.262(2)(C)1
- Waste packaged, marked and labeled per DOT during entire on-site storage period and prior to transport.....
- Placards available for use by transporters.....
- STORAGE STANDARDS 10 CSR 25-5.262(1) and 5.262(2)(C)2 and 3
- Facility inspected and maintained.....
- Date of accumulation marked.....
- Storage less than 90 days (unless small quantity generator).....

Explain

- Satellite Accumulation requirements met (if applicable).....
- a. Stored in satellite areas less than 1 year.....
- b. Container marked identifying contents and beginning date.....
- c. Containers kept closed/compatible/good condition.....
- d. Quantities accumulated not exceeding 55 gal. (1 quart acutely ha. waste).....
- CONTAINER STORAGE 10 CSR 25-5.262(1) and 5.262(2)(C)2
- Containers in good condition.....
- Containers kept closed in storage.....
- Containers storing incompatible waste separated or protected from each other.....
- Containers of ignitable or reactive waste stored > 50 feet from property line.....
- Containers stored within a containment system (if applicable) meeting criteria of 10 CSR 25-5.262(2)(C)2.B.....
- STORAGE TANKS 10 CSR 25-5.262(1) and 5.262(2)(C)2.C. N/A
- Tanks in good condition.....
- Procedure for assessing condition of tanks.....
- Above ground tanks - adequate spill confinement systems/inspected weekly.....
- Underground tanks that cannot be entered have adequate leak detection systems.....
- Leak detection procedure and schedule developed and used.....
- Open tanks have 2 ft. freeboard.....
- Incompatible wastes stored safely and properly.....
- Volatiles are not placed in open tanks.....
- Ignitable or reactive wastes stored safely and properly.....
- Ignitable or reactive wastes in covered tanks stored in accordance with NFPA's buffer zone requirements.....

## LARGE QUANTITY GENERATOR CHECKLIST

## HAZARDOUS WASTE STORAGE TANKS

WASTE CONTAINEDVOLUME OF TANK

_____	_____
_____	_____
_____	_____
_____	_____

37. Controls to prevent overfilling.....( )
38. Daily inspection of overfilling control equipment.....( )
39. Daily inspection freeboard in uncovered tanks.....( )
40. Covered in contingency plan.....( )
- F. PERSONNEL TRAINING 10 CSR 25-5.262(1)
41. Documentation of hazardous waste director's qualifications or training.....( )
42. Completed classroom or on-the-job training.....( )
43. Job title, description, and name of person filling position.....( )
44. Written record of the type and amount of training given.....( )
45. Documentation confirming that training has been given.....( )
- G. PREPAREDNESS AND PREVENTION 10 CSR 25-5.262(1) and 5.262(2)(C)2.E.
46. Internal communication or alarm system..... *Phone at 150 ft thru locked door* ( )
47. Device in the hazardous waste operation area capable of summoning emergency assistance.....( )
48. Fire control, spill control, and decontamination equipment available.....( )

49. Adequate water supply for fire control equipment.....( )
50. Adequate and proper safety equipment available.....( )
51. Adequate aisle space.....( )
52. Arrangements with local emergency agencies.....( )
- H. CONTINGENCY PLAN AND EMERGENCY PROCEDURES 10 CSR 25-5.262(1)
53. Contingency Plan.....( )
54. Detailed description of procedures that personnel must implement to respond to fires, explosions, or releases of hazardous waste.....( )
55. Describe formal arrangements with emergency agencies.....( )
56. Name, addresses, and phone numbers (home & office) of emergency coordinators.....( )
57. Emergency equipment including its description and location.....( )
58. Evacuation plan if applicable.....( )
- I. WASTE OIL 10 CSR 25-11.010
59. Written waste oil contract maintained.....( )
60. Waste oil properly stored and transported.....( )

COMMENTS: *#16 No DOT Label on drums ("Flammable Lig")*  
*#56 Need home address for #14 No Quarterly Rpts*  
*#59 Register waste oil waste stream*

Please mark boxes as shown

☒ In compliance  
☐ In violation

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Inspector's Signature \_\_\_\_\_

Title \_\_\_\_\_

Office \_\_\_\_\_

FORM LQGEN-INSP (Aug. 1, 1987)